

Mr. Jeff DeRouen Executive Director Kentucky Public Service Commission 211 Sower Boulevard Frankfort, Kentucky 40601

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JUL 1 5 2011

PUBLIC SERVICE COMMISSION

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LG&E and KU Energy LLC

220 West Main Street

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State Regulation and Rates

Louisville, Kentucky 40232

July 15, 2011

RE: Joint Application of Louisville Gas and Electric Company and Kentucky Utilities Company for Review, Modification, and Continuation of Existing, and Addition of New, Demand-Side Management and Energy-Efficiency Programs - Case No. 2011-00134

Dear Mr. DeRouen:

Please find enclosed and accept for filing the original and ten (10) copies of the revised response of Louisville Gas and Electric Company and Kentucky Utilities Company (collectively "the Companies) to the Association of Community Ministries, Inc. ("ACM") Question No. 8 of their Second Information Request dated June 28, 2011, in the above-referenced matter.

In the course of preparing the responses to the data requests, the Companies determined that information that was provided should be corrected or revised. Providing this information is consistent with the general direction in the Commission's May 20, 2011 Order in this proceeding that a party shall make timely amendment to any prior response if it obtains information which indicates that the response was incorrect when made or, though correct when made, is now incorrect in any material respect.

Mr. Jeff DeRouen July 15, 2011

Should you have any questions regarding the enclosed, please contact me at your convenience.

Sincerely,

Rick E. Lovekamp

cc: Parties of Record

Rick & Lonebank

COMMONWEALTH OF KENTUCKY

BEFORE THE PUBLIC SERVICE COMMISSION

In the Matter of:

JOINT APPLICATION OF LOUISVILLE GAS AND)
ELECTRIC COMPANY AND KENTUCKY UTILITIES) CASE NO.
COMPANY FOR REVIEW, MODIFICATION, AND) 2011-00134
CONTINUATION OF EXISTING, AND ADDITION OF NEW)
DEMAND-SIDE MANAGEMENT AND ENERGY-)
EFFICIENCY PROGRAMS)

REVISED RESPONSE OF
LOUISVILLE GAS AND ELECTRIC COMPANY
AND
KENTUCKY UTILITIES COMPANY
TO THE SECOND REQUEST FOR INFORMATION
OF THE ASSOCIATION OF COMMUNITY MINISTRIES, INC.
DATED JUNE 28, 2011

FILED: July 15, 2011

VERIFICATION

COMMONWEALTH OF KENTUCKY)	SS
COUNTY OF JEFFERSON)	

The undersigned, **Michael E. Hornung**, being duly sworn, deposes and says that he is Manager of Energy Efficiency Planning & Development for LG&E and KU Services Company, and that he has personal knowledge of the matters set forth in the responses for which he is identified as the witness, and the answers contained therein are true and correct to the best of his information, knowledge and belief.

Mula E. Hornung

Subscribed and sworn to before me, a Notary Public in and before said County and State, this 15⁴⁵ day of 2011.

Notary Public (SEAL)

My Commission Expires:

November 9, 2014

LOUISVILLE GAS AND ELECTRIC COMPANY KENTUCKY UTILITIES COMPANY

Revised Response to the Association of Community Ministries, Inc.
Second Request for Information
Dated June 28, 2011

Case No. 2011-00134

Question No. 8

Witness: Michael E. Hornung

- Q-8. Please refer to the Company's response to Question 8 of ACM's First Tendered Request for Information.
 - (a) Please provide the information set forth in items (a) and (c) of the Company's response for Jefferson County only, broken down by zip code, as requested. Should the Company decline to provide the requested Jefferson County figure and/or zip code breakdowns for either or both of (a) or (c), please explain in detail, respectively, why it so declines, including but not limited to an explanation of all of the specific processes and steps that would be required to produce the information; why the Company cannot undertake them; and why the Company was able to produce various customer data broken down by zip code in response to ACM's Second Request for Information in Case No. 2009-00549, but declines to do so in response to the instant request.
 - (b) Please refer to the Company's responses to items (b) and (d), wherein it is stated that the requested information "is not readily available and would require significant time and effort not permitted in the schedule." Please explain in detail all of the specific processes and steps that would be required to produce the requested information in each instance, including an explanation of why they would be unduly time-consuming in comparison to those required to produce other information the Company has provided the various parties pursuant to the schedule governing this proceeding. Please explain further why the Company has been able to produce information about recipients of third-party assistance in response to Questions 4(c), 6(f) and 20 of ACM's First Tendered Request, but not in response to Question 8(b) or (d).

A-8.

Original Response

(a) The Company has made subsequent efforts since the First Request for Information. These ongoing efforts have allowed the Company the necessary time to extract the following data:

Items (a) and (c): LG&E AC Tests and Tun	e-Ups	by Zi	o Code
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LG&E Zip	# of AC Tests	# of AC Tune- Ups	LG&E Zip	# of AC Tests	# of AC Tune- Ups	LG&E Zip	# of AC Tests	# of AC Tune- Ups	LG&E Zip	# of AC Tests	# of AC Tune- Ups
40004	1	0	40108	3	1	40210	8	2	40228	17	9
40006	3	3	40118	5	3	40211	21	7	40229	19	9
40014	23	8	40155	1	0	40212	13	7	40241	39	16
40023	2	2	40160	5	3	40213	20	9	40242	24	8
40026	4	1	40162	2	1	40214	36	13	4024.3	22	7
40031	29	16	40165	1	1	40215	20	13	40245	23	12
40033	2	2	40175	3	1	40216	39	15	40258	18	6
40050	2	2	40203	13	5	40217	26	8	40272	30	11
40056	7	4	40204	16	5	40218	27	13	40291	49	26
40057	2	0	40205	50	22	40219	33	16	40299	56	23
40059	28	10	40206	39	13	40220	42	23		•	•
40067	4	2	40207	71	22	40222	41	19			
40069	3	2	40208	11	5	40223	.32	10			

(b) The following response includes data only from April 1, 2009, through December 31, 2010. Data for January 1, 2008, through March 31, 2009 cannot be provided as the data is stored within the Companies Legacy Customer Information System, which classified AC Test and Tune-Up charges under "Non-Regulated Business" (NRB) billing. Because many billing other components were classified as NRB, creating and providing the requested information would require significant time and effort.

The Company has made subsequent efforts since the First Request for Information. These ongoing efforts have allowed the Company the necessary time to extract the following data:

Item (b) & (d): LG&E AC Tests and Tune-Ups with third-party assistance, by zip code

LG&E Zip	# of AC Tests	# of AC Tune- Ups	LG&E Zip	# of AC Tests	# of AC Tune- Ups
40203	1	1	40216	2	1
40206	1	1	40217	1	
40208	1	1	40218	1	1
40210	1	1	40219	2	
40211	1	1	40228	1	1
40212	2	2	40258	1	
40214	2		40272	1	1
40215	2	1	40299	1	1

Revised Response

- (a) The data provided in the original response is correct, but it should be noted that the AC Test and Tune-Up program became fully operational in May 2009. The data represented within the original response represents the timeframe May 2009 through December 2010.
- (b) The data provided within the original response is correct and representative of activity April 2009 through December 2010; however, as noted in response to (a) above, the AC Test and Tune-Up program became fully operational in May 2009. For that reason, the data provided in the original responses to (a) and (b) are directly comparable and cover, in effect, the same time period.